

February 7, 2013

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590

RE: Recall Campaign

Fuel filler neck missing anti-misfueling device

2013 Rolls-Royce Phantom

Dear Ms. Lewis:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act of 1966 and 49 CFR Part 573.

Pursuant to Section 573.6(c), we submit the following information.

Manufacturer:

Rolls-Royce Motor Cars, Ltd.

Designated Agent:

(pending)

Samuel Campbell, III

Department Head, Safety Engineering and ITS

BMW of North America, LLC 200 Chestnut Ridge Rd. (Bldg. 150)

Woodcliff Lake, NJ 07677

2. Make: Rolls-Royce

Model Year / Model

Inclusive dates of manufacture

2013 / Phantom

Nov. 2, 2012 - Jan. 18, 2013

- The number of vehicles in the affected range is approximately 27. Of these vehicles,
 are under the care of Rolls-Royce dealers, while 7 have been sold to customers.
- The percentage of vehicles estimated to contain the condition is less than 5%.
- The issue involves the fuel filler neck. A batch of incomplete fuel filler necks was provided by the supplier. Specifically, the anti-misfueling device was missing. This

Rolls-Royce Motor Cars

Rolls-Royce Motor Cars NA, LLC
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Office Address: 300 Chestnut Ridge Road, Woodcliff Lake, NJ 07677-7731
Telephone (201) 307-4000 Fax (201) 571-5479
www.rolls-roycemotorcars.com
A BMW Group Company



device prevents refueling with the wrong fuel type (i.e., diesel), but also discharges static electricity into the metallic structure of the chassis during refueling.

The name, business address, telephone number, and contact person of the supplier, and country of origin of the component, is:

Name - Nigel Taylor
Department - Quality Management
Kautex Textron Unipart Limited
Coventry Business Park
Renown Avenue
Coventry
United Kingdom, CV5 6UD
Tel: 44 (0) 7802 961489

Tel: 44 (0) 7802 961489 Fax: 44 (0) 2476 671111

Email: Nigel.Taylor@kautex.textron.com

Country of Origin - United Kingdom

 Rolls-Royce became aware of this matter through its internal quality control analyses and processes.

As part of normal quality control, on January 24, 2013, two of the vehicles examined in the Goodwood plant were observed to be missing the anti-misfueling device in the fuel filler neck.

Initial analysis and discussion with the supplier revealed that the fuel filler neck was manufactured out of specification. The supplier was ordered to review its production records to identify the specific fuel filler neck production lot.

From January 25th to January 31st, Rolls-Royce Motor Cars performed further analysis in order to examine possible additional failure characteristics, and to determine an accurate probability for an occurrence in the field. A review of vehicle production and manufacturing records was also undertaken based upon the supplier's production records, in order to determine the number, and production range of potentially affected vehicles. This resulted in the ability to identify the affected fuel filler neck production lot with the corresponding affected vehicle production range.

On February I, 2013, Rolls-Royce Motor Cars took the decision to conduct an immediate voluntary recall.

Rolls-Royce Motor Cars has not received any reports, nor is Rolls-Royce Motor Cars otherwise aware of any accidents or injuries related to this issue.

- Not applicable.
- Rolls-Royce will conduct a recall campaign to remedy the affected vehicles. The vehicles will be inspected and the fuel filler neck will be replaced, if necessary.

Rolls-Royce expects to begin and complete dealer notification in February 2013, and begin and complete owner notification in February 2013.

- 9. Not applicable.
- 10. A copy of the Service Bulletin will be submitted when available. As discussed and agreed with NHTSA, Rolls-Royce will contact all affected owners by telephone and therefore, at this time, a notification letter to owners is not necessary. If Rolls-Royce finds that a notification letter is necessary, a draft copy of the letter will be submitted to NHTSA prior to the mailing.
- 11. Not applicable.

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Sincerely,

Sam Campbell

Department Head

Safety Engineering and Intelligent Transportation Systems